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A PROFESSIONAL LIMITED LIABILITY COMPANY

March 10, 2023

**Via ECF**

The Honorable Robert W. Lehrburger  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: Nival v. Sugar Factory Broadway LLC, et al  
Civil Action No. 22-cv-08463 (LGS)(RWL)

Your Honor:

This office represents Plaintiff in the above-referenced matter. Plaintiff writes to respectfully request an extension of time from today to April 7, 2023 to submit Proposed Findings of Fact and Conclusions of Law concerning all damages and other monetary relief permitted under the entry of default judgment. Plaintiff also requests a corresponding extension of time for Defendant Sugar Factory Broadway LLC to submit its response, if any, to Plaintiff's submission from March 24, 2023 to April 21, 2023. The requested extension is necessary to finalize affidavits and collect supporting documents supporting the Proposed Findings.

Plaintiff thanks the Court for its time and attention.

Request granted. By March 15, 2023, Plaintiff shall serve a copy of this order on Defendants by any means previously approved by the Court, and shall file proof of service of same.

Respectfully submitted,

**PHILLIPS & ASSOCIATES,  
ATTORNEYS AT LAW, PLLC**

SO ORDERED:

3/10/2023



HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

By: /s/ Shawn Clark

Shawn Clark, Esq.